



# Environmental Protection Agency

117 W. Main Street Collinsville, IL. 62234

EPA Region 5 Records Ctr.



382832

**CERTIFIED**  
**#128803**

618/345-4606

Refer to: LPC 11902002 - Madison County - East Alton/Olin Corporation  
ILD006271696  
Compliance Inquiry Letter

August 17, 1984

Olin Corporation  
Shamrock Street  
East Alton, Illinois 62024

Attention: L. W. Maxson

Dear Mr. Maxson:

On July 26 and 27, 1984, representatives of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of your facility. The purpose of the inspection was to determine your facility's compliance with the Environmental Protection Act, Ill. Rev. Stat. 1982, Ch. 111 1/2, pars. 1001 et seq., as amended and regulations adopted by the Illinois Pollution Control Board. During the inspection apparent violations were revealed. The purpose of this letter is to inquire as to your position with respect to the validity of the Agency's findings and also your plans to correct the apparent violations. Enclosed with this letter is a copy of the inspection report. The following apparent violations do not reflect that portion of the inspection regarding Subpart F: Ground Water Monitoring regulations.

Section 725.171(a)(4)  
722.122(a)(4)

Failure to send the required copies of manifests to the Agency for interzone shipments of waste transported on public roads. Until the use of Olin's "Hazardous Waste Interzone Shipment Log" has been approved by the Agency, the above stated violation(s) will remain.

Although not documented as a violation, it was discussed with Mr. Redington, after the inspection, that the facility's "Hazardous Waste Employees Training Record" should be amended to include written job descriptions, as well as written descriptions of the type and amount of introductory and continuing training. Although some records included job descriptions, none listed the type and amount of training received. Refer to Section 725.116(d)(2)(3).

August 17, 1984

The inspection of the Material Reclamation Facility (MRF) revealed boxes of empty primed shotshells that are presently stored west of the MRF building. It is the Agency's understanding that these shells contain their primers and possibly residual lead and, as such, are hazardous due to the characteristic of Reactivity (D003) and possibly EP toxicity for lead (D008). Please submit information detailing the RCRA status of these shells as to their present storage method, as well as ultimate disposal intentions.

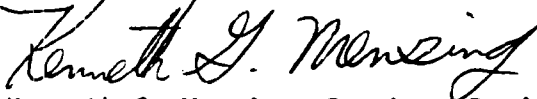
In compliance with Part 725.156(j), Olin is required to submit reports when an incident has occurred which address the time, date, and details of any incident that requires implementing the contingency plan. In three (3) such reports contaminated soil has reportedly been removed to a hazardous waste landfill, however in house special waste stream applications do not address contaminated soil. Under what special waste authorization numbers and manifest numbers was contaminated soil disposed for incident reports dated April 9, 1984, May 13, 1983 and November 4, 1982?

Please submit in writing, within 15 calendar days of the date of this letter, the reasons for the apparent violations outlined above, as well as a description of the steps you have instituted to prevent any further recurrence of the above cited violations. The written response should be sent to the address of this office, given above.

Further, take notice that non-compliance with the Illinois Environmental Protection Act and the Rules and Regulations adopted thereunder may be the subject of an enforcement action pursuant to Title VIII of the Illinois Environmental Protection Act, Ch. 111 1/2, Ill. Rev. Stat., Sec. 1001 et seq.

If you have any questions regarding the above, please contact me at 618/345-4606.

Sincerely,



Kenneth G. Mensing, Southern Regional Manager  
Field Operations Section  
Division of Land Pollution Control

TEP:jlr

cc: Division File  
Southern Region ✓

August 17, 1984

Division File

FROM: Tom Powell *AP Southern Region*

SUBJECT: LPC 11902002 - Madison County - East Alton/Olin Corporation: Main Plant  
ILD006271696

On July 26, 1984, Mike Grant and Pat McCarthy accompanied this inspector during the RCRA inspection of Olin's Main Plant facility. On July 27, 1984 Mike Grant again accompanied this inspector for the RCRA inspection of Olin's Zone 17, as well as various "paper" requirements that were not addressed at the Main Plant on the previous day.

On July 26, 1984, the following sites were observed and reviewed for their RCRA compliance; 1-1, 1-7, 1-11, 1-12, 1-18, 3-1, 4-1, 4-2a, 4-2c, 4-3. During the visit, sites 1-8 and 1-9 were observed, but their related paper requirements were not reviewed.

During the inspection, it was discovered that Illinois manifests are not being used when transporting wastes from any of the Zone 1 regulated units to either the Zone 3 or 4 areas, even though the transportation of the waste occurs on a public road. Olin uses it's own tracking form known as a "Hazardous Waste Interzone Shipment Log". Olin representatives provided 3 letters addressed to members of the manifest unit requesting that Illinois manifest requirement between zones be dropped. As of this write-up date, no response has been received by Olin. A more recent letter dated October 21, 1983 from Terry Ayers, IEPA, to George Goforth, Transportation Manager of Olin, references guillotined shotgun shells. Mr. Ayers states that Illinois manifests, as well as licensed waste haulers, must be utilized for the transportation of wastes. Until Illinois manifests are used or unless written exemption is received, the MRF (site 4-2) and incinerator (site 3-1) is in violation of 725.171(a)(4); while the origin of hazardous waste (sites other than those in Zone 4) are in violation of 722.123(a)(4), for wastes transported to the MRF or incinerator.

Although not documented as a violation, it was discussed during the inspection that the facility's personnel training records should be amended to include written job descriptions, as well as written descriptions of the type and amount of introductory and continuing training. Refer to Section 725.116(d)(2) and (3). Types and amounts of training were not available on any of the training records.

During the inspection of the Materials Reclamation Facility (MRF) of Zone 4, boxes of empty primed shotshells were being stored just west of the MRF building. The shells were reported to be recycled in the future for their heat value at the "new" incinerator (site 3-1) (Section 721.102(c)(2)). The shells, however, have been stored in their present location since 4/3/81, the time of the original ISS inspection. The shells are hazardous (D003) because of their primers, but Olin claims that they are exempt because of Section 721.102(c)(2). An attempt must be shown by Olin that they intend to reduce the amount of shells in storage.

August 17, 1984

In compliance with Title 35, Subtitle G, Chapter I, Part 725.156(j), Olin has supplied the Agency with reports that summarize incidents. In three (3) such reports, contaminated soil was removed to a hazardous waste landfill, however, in house special waste stream applications do not address contaminated soil for incident reports dated April 9, 1984, May 13, 1983 and November 4, 1982.

TEP:jlr

cc: Southern Region File